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7 **IN THE UNITED STATES BANKRUPTCY COURT**  
8 **FOR THE DISTRICT OF ARIZONA**

9 In re:  
10 ERIN A WILLETT,  
11 Debtor.

Chapter 13 Proceedings

4:19-bk-15365-BMW

12 **STIPULATED MOTION TO VACATE**  
13 **DISMISSAL ORDER (REINSTATE**  
14 **BANKRUPTCY)**

16 COMES NOW Erin A Willett (“Debtor”), by and through undersigned counsel and moves this  
17 Honorable Court for an Order Vacating the Dismissal Order and reinstating the case and stay as to ALL  
18 CREDITORS. In support of the Motion, the Debtor state:

- 19 1. This case was commenced by Voluntary Petition filed by the Debtors on December 5,  
20 2019.
- 21 2. The case was dismissed on March 15, 2021 for delinquent plan payments.
- 22 3. As of April 2, 2021 the Debtor has turned over funds to clear any plan payment  
23 delinquency.
- 24 4. Accordingly, the Debtors now asks that the Court reinstate the case as to all creditors.

25 If the deadline(s) for filing complaints under FED.R.BANKR.P. 4004(a) or 4007(c), motions  
26 under FED.R.BANKR.P. 1017(e), or proofs of claim under FED.R.BANKR.P. 3002(c) expired on or  
27 after the date the case was dismissed, or if less than thirty (30) days remains until such deadline, Debtor(s)  
28 waive the right to object to complaints, motions, or proofs of claim filed under FED.R.BANKR.P.

4004(a), 4007(c), 1017(e), and 3002(c) on grounds of timeliness, so long as they are filed in the thirty (30) days following notice of reinstatement of the case.

**WHEREFORE**, Debtor moves this Honorable Court for the entry of an Order Reinstating the Case and Stay with regards to all creditors.

Agreed to by Chapter 13 Trustee, Dianne C Kerns

/s/ *S. Morris* ASB# 011628 (for)

Dianne C Kerns, Chapter 13 Trustee

Dated: April 5, 2021

/s/Ryan Allen Dorn (034017)

## Attorney for Debtors